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13 *Attorneys for Plaintiff*
14 *Miriam Goldberg*

15 UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 Miriam Goldberg,)	Case No.: 3:24-cv-4525
18)	
19 Plaintiff,)	SECOND JOINT STIPULATION AND
20)	PROPOSED ORDER TO ENLARGE
21 v.)	DEADLINE TO COMPLETE
22 TeachBK, Inc., <i>et al.</i> ,)	MEDIATION
23)	
24 Defendants.)	
25)	
26)	
27)	
28)	

29 Plaintiff Miriam Goldberg and Defendants Ilya Kiselev, and Andrey Burtsev
30 (collectively, "Defendants") hereby agree and stipulate as follows:

31 The Court referred this case to mediation on February 28, 2025. [ECF No. 47]. Pursuant
32 to the ADR Local Rule 6.4(c), mediation was to be completed by May 29, 2025. Prior to that
33 deadline, on April 24, 2025, counsel for Defendants moved to withdraw from this case. [ECF
34 No. 50]. Because of that fact, the parties stipulated to enlarge the deadline to complete
35 mediation through July 31, 2025, which the Court adopted. [ECF Nos. 52 & 53]. Defendants

are now proceeding pro se, [see ECF No. 54], and have recently met and conferred on discovery matters as required by the Court [ECF No. 56]. To ensure that the parties can meaningfully resolve disputed discovery matters and further develop the issues and facts prior to conducting mediation, the parties have agreed to enlarge the deadline by an additional 90 days, through October 29, 2025, to complete mediation.

Accordingly, the parties stipulate and jointly request that the Court enlarge the deadline to complete mediation through October 29, 2025.

IT IS SO STIPULATED.

Dated: July 11, 2025

Respectfully submitted,

SLATER LEGAL PLLC

By: /s/ James M. Slater

James M. Slater (admitted *pro hac vice*)

Attorney for Plaintiff Miriam Goldberg

/s/ Andrey Burtsev (w/ express permission)

Andrey Burtsev, Defendant

/s/ Ilya Kiselev (w/ express permission)

Ilya Kiselev, Defendant

ATTESTATION OF CONCURRENCE

I, James M. Slater, am the ECF User whose ID and password are being used to file this **JOINT STIPULATION**. I attest that, pursuant to United States District Court, Northern District of California L.R. 5-1(i)(3), concurrence in the filing of this document has been obtained from Defendants. I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 11, 2025

SLATER LEGAL PLLC

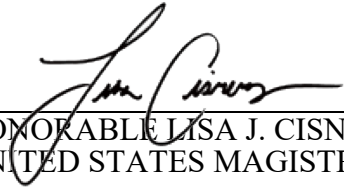
By: /s/ James M. Slater

James M. Slater (admitted *pro hac vice*)

~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation, and good cause appearing, the Court ORDERS that mediation must be completed no later than October 29, 2025.

Dated: August 18, 2025



HONORABLE LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE